

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**SECOND SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS WADE
(UPS/USPS-T20-4 through 18)**

(September 17, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Wade (UPS/USPS-T20-4 through 18).

Respectfully submitted,



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Of Counsel.

**SECOND SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS WADE**

UPS/USPS-T20-4. For the Base Year, what was the total of cubic foot miles (CFM) that moved via Vehicle Service Drivers (VSD) for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

UPS/USPS-T20-5. For the Base Year, what was the total of cubic foot miles (CFM) that moved via Highway Contract Routes (HCR) for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

UPS/USPS-T20-6. For the Base Year, on segments where both VSD and HCR are available, what was the total of CFM that moved by VSD for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

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UPS/USPS-T20-7. For the Base Year, on segments where both VSD and HCR are available, what was the total of CFM that moved by HCR for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

UPS/USPS-T20-8. For the Base Year, on segments where both VSD and HCR are available, what percentage of HCR segments are available under:

- (a) intra-SCF contracts;
- (b) inter-SCF contracts;
- (c) intra-BMC contracts;
- (d) inter-BMC contracts;
- (e) all other contracts (please specify).

UPS/USPS-T20-9. On average, is mail carried by VSD more or less time-sensitive than mail carried by HCR? Please explain your response.

UPS/USPS-T20-10. On average, is cube utilization better on VSD segments or on HCR segments?

UPS/USPS-T20-11. For the Base Year, what percentage of VSD routes are scheduled, as opposed to ad hoc?

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UPS/USPS-T20-12. For the Base Year, what percentage of HCR routes are scheduled, as opposed to ad hoc?

UPS/USPS-T20-13. Please explain the complete decision-making process of assigning mail to either VSD or HCR.

UPS/USPS-T20-14. Please explain the complete decision-making process concerning which type of truck to load first, including at a minimum, a comparison of VSD trucks vs. HCR trucks.

UPS/USPS-T20-15. Please explain the complete decision-making process concerning which type of truck to unload first, including at a minimum, a comparison of VSD trucks vs. HCR trucks.


UPS/USPS-T20-16. Would it be accurate to say that, on average, preferential freight is more likely to travel on VSD than on HCR? If not, please explain.

UPS/USPS-T20-17. For the Base Year, what percentage of annual VSD CFM involved an AMC/AMF as either the origin service point or the destination service point?

UPS/USPS-T20-18. For the Base Year, what percentage of annual HCR CFM involved an AMC/AMF as either the origin service point or destination service point?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



Albert P. Parker, II

Dated: September 17, 1997
Philadelphia, PA